

EXHIBIT B

- Deviating from the specifically agreed upon subject matters, Bengtson starts by stating he “finally get[s] to show you guys this video” (0:01 – 0:03) – specifically referring to a video he originally made and intended to post on or about December 1, 2017. A video that counsel for Bengtson denied existed in Chambers when asked whether a rough version of the video existed.
- Instead of honoring the agreed-upon specific subject matters in Section 2(iv)(a)-(f) and the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson issues a wholly unsanctioned diatribe about how the original video he wanted to post on or about November 28, 2017:

was intended to defend mine and Alissa’s self from the video that Barley House released. There is a lot of fucked up shit going on in that video, and trust me I wanted to show you guys ASAP.

I originally planned on uploading this video at the end of November, I think November 28th, a day, only a day after they posted their video. Unfortunately, I was not allowed to do so, legally not allowed to do so.

To give you guys a little timeline on what exactly happened, Barley House uploaded their video in response to the whole situation. I found a lot of problems in this video, so obviously I planned on responding to this video. However, I could not because Barley House successfully filed a TRO against myself and Alissa which prevented us from speaking on the matter. We were not allowed legally to defend ourselves; we were not allowed to respond about the night at all. This was a problem, a HUGE problem because Barley House got a lot of things wrong and they were not as perfect as they claim to be this night.

In the meantime, while Alissa and I are unable to speak, they put out ads on YouTube sharing this video, spreading it as far across the Internet as they could. Again, with mine and Alissa’s inability to defend ourselves or speak at all about it.

It took so long for this video to come out because the legal process is very slow. Alissa and I had to fly to Cleveland, we had to pay a lot of money for flights and lawyers and hotels and all that shit, just so you guys could see this video, we did it just so you guys could see this video. I was allowed to post other videos, don’t get me wrong, I could have went on with my life and pretended like nothing happened but that was a huge problem for me; that’s just not who I am. More often than not YouTubers will go about their life, pretend like nothing happened if shit gets too hot. I could not do that, I could not have anyone thinking that this side of the story was the only side of the story. I had to share this with you guys, I’m

more excited than anything to just be able to show you guys this. It took so much time; more work and effort and time and money went into this video than anything by far on my channel and Alissa's channel. This was so hard to get out to you guys.

Washington Post did a pretty interesting article on the matter, and before I had even seen this, that is exactly how I felt about the matter. They talk about how my freedom of speech is potentially being violated in all this. That is exactly how I felt. I had to sit by the sidelines and have a whole bunch of people think that this happened like the way they said it did when it didn't at all happen like that. I was patient, I respected the legal process, and we finally got it reversed.

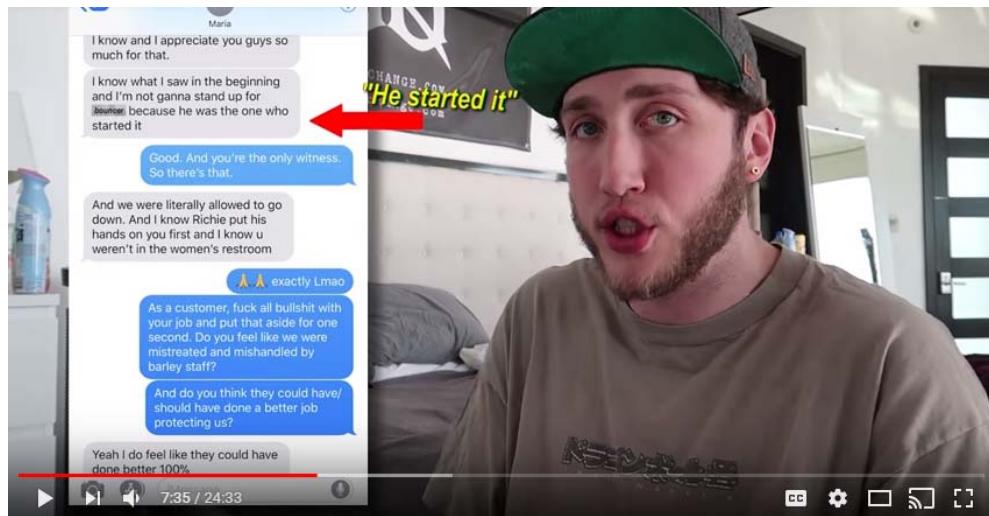
But without further ado, enjoy the fucking video [aka the original response video]".

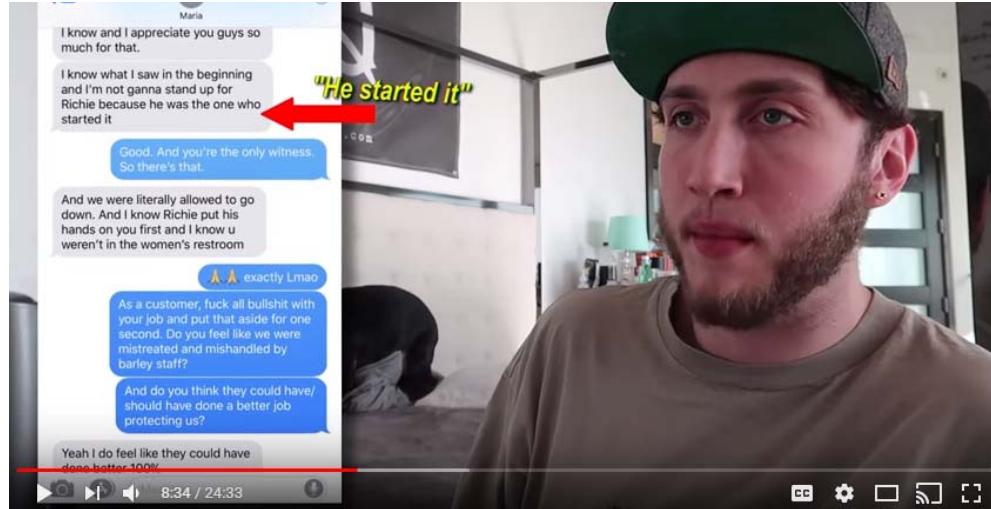
(0:32 – 2:37)

- Instead of honoring the agreed-upon specific subject matters in Section 2(iv)(a)-(f) and the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson specifically implicates Barley House by stating “everyone involved in the incident between me, Alissa and the Barley House made mistakes throughout the night, we all could have handled it better,” referencing his prior video from November 29, 2017 and further claiming that the Disputed Events “didn’t happen for no reason, obviously something happened” (2:40 – 3:06).
- Instead of honoring the agreed-upon specific subject matters in Section 2(iv)(a)-(f) and the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson continues to smear Barley House and incite a response by arguing that Barley House “released their video, it got posted to Reddit, and a wave of Reddit users came and just started blasting my video, started blasting me on Twitter and stuff” (3:07 – 3:24).
- Instead of honoring the specifically limited subject matter and talking point in Section 2(iv)(d) and simply stating that Alissa’s mother did not apologize, Bengtson took it several steps further by claiming Alissa’s mother was “just as mad, if not the most mad about the situation” (3:47 – 3:50).
- Instead of honoring the agreed-upon specific subject matters in Section 2(iv)(a)-(f) and the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson incredibly provides his commentary wherein he “break[s] down what Barley did wrong” and “the past of Barley, just to support my claims that this isn’t a perfect establishment, going on to state that “Barley is not right in this, and I’m going to go into where they went wrong,” inciting his CloutGang by stating “You guys are probably asking yourself, ‘Well, if this guy hit Alissa and he doesn’t work

for Barley, then what is the problem? What did they do wrong?" They did plenty wrong (3:56 – 4:02; 4:55 – 5:08).

- Instead of honoring the specifically limited subject matter and talking point in Section 2(iv)(a) that "he did not start any physical altercation," and the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House and Plaintiff Richie Madison in Section 2, he instead specifically identifies Madison by name in a text message screenshot and details that "my beef with Barley is with what happened in the basement with [the bouncer] where he grabbed me by my neck, dragged me up the stairs for no other reason than me waiting in a restricted area As I said in my last video, I was allowed to be down there, he shouldn't have done this, he mishandled the situation 100%," he "was wrong, Barley was wrong. Barley staff, they were wrong, period" (5:09 – 5:51).
- Instead of honoring the specifically limited subject matter and talking point in Section 2(iv)(a) that "he did not start any physical altercation," and the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, he goes on to provide a detailed breakdown of, and his response to, security footage and "poke holes in [Plaintiffs'] story", in the process again specifically identifying Madison by name in a text message screenshot (5:52 – 9:20). Bengtson later continues to provide a detailed breakdown of, and his response to, security footage almost entirely outside the scope of the agreed-to talking points (11:42 – 17:44), broadly claiming without limitation or regard for the Settlement Agreement that "this video, this footage, this narrative, the narrative – its complete bullshit" (17:44 – 17:48).





- Disregarding the specifically limited subject matter in Section 2(iv)(a)-(f), Bengtson accuses the Barley House of having additional security footage, demands the release of the footage and accuses Barley House of lying. (7:48-8:48).
- Disregarding the specifically limited subject matter in Section 2(iv)(a)-(f), Bengtson tries to provide context for his statement in a prior video that he “did not have an aggressive bone in my body,” again trying to provide a response to the Barley House video on an issue well outside the scope of the Settlement Agreement (10:01 – 10:54).
- Disregarding the specifically limited subject matter in Section 2(iv)(a)-(f) and in violation of the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson discusses the supposed “lack of help or protection from Barley at all,” and how they supposedly “did nothing throughout the night to help us. They were mocking us on the way out. They were telling us ‘Get the fuck out of here, we don’t give a fuck who you are.’ All this crazy shit. We didn’t blast this place for no reason. Obviously something happened, obviously we felt wronged I get embarrassed, thrown out, dragged out by my neck, her family is all there. It was embarrassing for me, I was mad. Alissa got hurt in all of this. And all this has everything to do with Barley. * * * Barley is not perfect (10:55 – 11:42).
- Disregarding the specifically limited subject matter in Section 2(iv)(a)-(f) and in violation of the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson accuses Barley House of “chang[ing] these minor little to make me look even worse than I am” (13:39 – 13:43).
- Disregarding the specifically limited subject matter in Section 2(iv)(a)-(f) and in violation of the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson accuses “Barley security [of] grab[bing] Alissa and . . . pushing her this way” and accusing Barley House of favoritism and treating the Defendants unfairly (13:43 – 14:42).

- Disregarding the specifically limited subject matter in Section 2(iv)(a)-(f) and in violation of the provision that “Defendants shall take all reasonable steps to ensure that the above-described video will not incite any hostile or violent reactions toward . . . known patrons of the Barley House or its affiliated entities,” Bengtson discusses in great detail the “guy [and his girlfriend] who hit Alissa” – both of whom are, in fact, known by the Defendants to be patrons of Barley House (18:00 – 19:06).
- Disregarding the specifically limited subject matter in Section 2(iv)(a)-(f) and in violation of the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson transitions into about two (2) minutes of “last words” during which he claims that “Barley did shit wrong” (19:10 – 19:11), that he feels he “is a victim of [Barley’s alleged] misinterpretation of the night” (19:12 – 19:20), and that the guy and his girlfriend who hit Alissa (i.e. known patrons of Barley House) “are not victims” (19:20 – 19:22), among other topics designed to incite hostile and violent reactions in violation of the Settlement Agreement.
- Disregarding the specifically limited subject matter in Section 2(iv)(a)-(f) and in violation of the promise to take all reasonable steps to not incite any hostile or violent reactions to the Barley House in Section 2, Bengtson thanks his fans on behalf of himself and Alissa, claiming “we see all the tweets, we see all the comments, we see all the love, I see all the likes. I love you guys so much, like you guys mean the world to me, you’re part of our family” (20:58 to 21:24). It is important to remember that at this time, on or about December 1, 2017, the “tweets” and “comments” were largely death threats and threats of violence.

4825-3260-3994, v. 1